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4/28/98

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5 BTAG**

**DATE:** April 29, 1998

**SUBJECT:** Indiana BTAG Meeting, 4/27/98 - Memorial Drive Dump, Muncie; and American Chemical Services (ACS), Griffith. **DRAFT**

**FROM:** Region 5 Biological Technical Assistance Group (BTAG) Co-chairs:

James Chapman, Ph.D., Ecologist, USEPA  
Brenda Jones, Ecologist, USEPA

**TO:** Verneta Simon, OSC, USEPA  
Sheri Bianchin, RPM, USEPA

This memo summarizes the results of a BTAG meeting held 4/27/98 at Gibson Woods, Hammond, IN. The procedures for regularly scheduled BTAG meetings, and the Memorial Drive Dump, Muncie; and ACS, Griffith, sites were discussed. Attendees included:

USEPA: James Chapman, Brenda Jones, Verneta Simon  
IDEM: Jim Smith, Tim Johnson  
IDNR: Wayne Faatz  
Ecology & Environment (USEPA START Contractor): Lisa Del Muro

**Regularly Scheduled BTAG Meetings**

The first topic concerned the regularly scheduled BTAG meetings. The participants agreed to the following:

- meetings will be held 3 times per year (the frequency may be reduced if several other states also agree to regularly scheduled meeting);
- ad hoc meetings may be requested as needed for specific sites, and will be required for BTAG site visits since the regularly scheduled meetings will include multiple sites;
- any site subject to CERCLA regulations (including OPA and non-NPL sites) may be proposed for the BTAG meeting;
- site proposals should be sent to the BTAG co-chairs at least 3 weeks before the regularly scheduled meeting;
- the BTAG co-chairs will circulate the draft agenda 2 weeks before the regularly scheduled meeting;

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- comments on and changes to the agenda are due within 1 week after the draft agenda is circulated;
- the BTAG co-chairs will circulate the final agenda 1 week before the regularly scheduled meeting;
- selection, duplication and distribution of site-related documents are the responsibility of the person who proposed the site for BTAG consideration
- BTAG will clarify that it's recommendations do not constrain the Natural Resource trustees from further actions related to NRDA activities and other trust responsibilities; that is, emphasize that BTAG's role is to comment on USEPA or state CERCLA-related work, but does not speak for the trustees
- draft BTAG meeting memoranda will be circulated among the participants for comment before issuing final memoranda
- regularly scheduled meetings will not be rescheduled to accommodate individuals with conflicts.

#### Action Items - BTAG Regularly Scheduled Meetings

Jim C. - Propose meeting dates.

Starting from April, the other meeting months are August and December. I propose the 2nd Mondays (so that we do not try to meet in late December).

Wayne F. - Draft disclaimer language.

#### **Memorial Drive Dump, Muncie**

The topics of discussion included removal options and design, post-removal responsibilities for the site, data needs, and ERA methodology.

BTAG recommends retaining riparian trees wherever feasible. BTAG does not have sufficient information on uptake and translocation of lead to predict whether cycling of lead from the subsoil to the surface is likely with deep rooting native grasses or trees. A general recommendation is to revegetate with short-rooted landscaping grasses to avoid potential uptake, so long as arrangements can be made for periodic mowing to suppress the establishment of woody plants. Several other aspects of removal design were discussed, but there are no specific BTAG recommendations.

BTAG recommends additional sediment sampling to delineate the areal extent of sediments with elevated lead contamination along the southeast portion of the site. BTAG does not recommend performing an ERA for the sediment contamination at this time because it appears to be

restricted to a limited area. A screening assessment against the Ontario severe effect level (SEL) sediment guidelines is recommended to evaluate potential impacts to benthic invertebrates in order to protect the foraging habitat for fish.

For the terrestrial lead contamination, BTAG recommends performing an ERA that evaluates the vermivorous exposure pathway (consumption of earthworms and other soil invertebrates) for robin and shrew receptors. A field study is not required at this point, the earthworm bioaccumulation factor for lead may be estimated from literature uptake values.

There was some discussion regarding IDNR's willingness to take responsibility for the site under a covenant not to sue. IDNR requires further discussions with the Mayor of Muncie before making a decision.

#### Action Items - Memorial Drive Dump, Muncie

There are no action items at this time for BTAG members. Jim C. will provide lead uptake and ecotoxicological parameters for a terrestrial ERA at the request of the project managers.

#### ACS, Griffith

The topics of discussion included the results of the latest round of sediment samples, wetland excavation proposal, and a proposed focused wetland ERA.

The analytical results of the sediment sampling in the ditch draining the ACS wetland to Turkey Creek were distributed and discussed. The main finding is that PCBs are not detectable downstream of the wetland, which indicates that the PCBs in the runoff west of the plant area were efficiently trapped by the wetland sediments. The presence of a second area of deposition of PCBs from runoff north of the plant area is shown by the 8.8 ppm A1254 at ST11, along with previous sediment results of 2.4 and 3.9 ppm PCBs at SD28 and SD26, respectively (Technical Memorandum Wetland Investigation, May 1997, prepared by Montgomery Watson for ACS RD/RA Executive Committee).

The ACS proposed excavation of the wetland PCBs was discussed (Wetland Sediment PCB Concentration Map and Proposed Area of Excavation, 3/12/98, prepared by Montgomery Watson). The consensus was that the proposal is a good start that with minor modifications would merit BTAG approval.

A focused ERA for deriving a wetland PCB cleanup goal was discussed. BTAG agreed that rails would be appropriate endpoints, combining insectivorous/vermivorous exposure pathways with home ranges commensurate with the area of contamination. BTAG agreed that the literature on earthworm bioaccumulation would serve as an appropriate surrogate for uptake by other wetland invertebrates. BTAG cautions that rails would not be appropriate species for field studies, and, if necessary, recommend field studies of a passerine.

#### Action Items - ACS, Griffith

There are no action items at this time for BTAG members. Jim C. will provide rail life history and ecotoxicological parameters for a wetland ERA at the request of the project managers.

cc: Larry Schmitt, USEPA Section Chief, RRS #1

Verneta Simon, Sheri Bianchin, USEPA

Jim Smith, IDEM

Wayne Faatz, IDNR

Dan Sparks, Ed Karecki, USFWS

Todd Goeks, NOAA